

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|------------------------------------|---|------------------------------|
| SECURITIES AND EXCHANGE |) | |
| COMMISSSION, |) | |
| |) | |
| |) | |
| Plaintiff, |) | Case No. 1:25-CV-00616 |
| |) | |
| v. |) | |
| |) | Honorable Lindsay C. Jenkins |
| ARETE WEALTH MANAGEMENT, LLC, |) | |
| ARETE WEALTH ADVISORS, LLC, JOEY |) | |
| DALE MILLER, JEFFERY SCOTT LARSON, |) | |
| RANDALL SCOTT LARSON, and UNBO |) | |
| CHUNG, |) | |
| |) | |
| |) | |
| Defendants. |) | |

**AGREED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT,
FOR LEAVE TO FILE BRIEFS IN EXCESS OF 15 PAGES IN SUPPORT OF MOTIONS
TO DISMISS AND TO ENTER AN AGREED BRIEFING SCHEDULE ORDER**

Defendants Arete Wealth Management, LLC, Arete Wealth Advisors, LLC, Joey Miller, Jeffrey Larson, Randall Larson, and Unbo Chung, by and through their respectful counsel, request a two-week extension of time to answer or otherwise plead to the complaint and leave for defendants to file briefs in support of their motions to dismiss the complaint in excess of the fifteen-page limit. Defendants also request that the Court enter an agreed briefing schedule order. In support of their motion, Defendants state as follows:

1. This is Defendants' first request for extension of time.
2. Defendants have waived service of summons and the complaint. Defendants' deadline to answer or otherwise plead is March 24, 2025.
3. Defendants seek a two-week extension of time to answer or otherwise plead from March 24, 2025 to April 7, 2025. This request is not made for purposes of delay, but rather to

efficiently address the 57-page, 337 paragraph complaint setting forth nine counts against six defendants. Counsel for plaintiff has agreed to this two-week extension of time to answer or otherwise plead.

4. Defendants additionally request leave for each Defendant to file their brief in excess of 15 pages, and up to 25 pages, in support of their motions to dismiss. As noted, the complaint is 57 pages and 337 paragraphs long. Nevertheless, the Defendants do not anticipate that each party will require up to 25 pages and do not make this request to burden the parties or this Court. For example, Defendants Miller, Larson, and Larson face many overlapping allegations and counts, and will coordinate their submissions so as not to duplicate arguments. Counsel for plaintiff has also agreed to this request.

5. Defendants also request that the Court enter an agreed briefing schedule order as follows:

- a. Defendants will file and serve their motions to dismiss and memoranda in support thereof on or by April 7, 2025;
- b. Plaintiff has requested to have until May 19, 2025 to file its responses;
- c. Defendants will file their replies on or before June 9, 2025.

The parties' counsel have agreed to this schedule.

WHEREFORE, Defendants by and through their counsel, request that the Court enter an order (1) granting a two-week extension of time to answer or otherwise plead in response to the complaint until April 7, 2025; (2) granting leave for Defendants to each file briefs in support of their motions to dismiss up to 25 pages; and (3) setting May 19, 2025 as the deadline for Plaintiff to file responses to the motions to dismiss and June 9, 2025 as the deadline for Defendants to file replies.

Dated: March 10, 2025

Respectfully submitted,

ARETE WEALTH MANAGEMENT, LLC

ARETE WEALTH ADVISORS, LLC

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CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that on March 10, 2025, I electronically filed the foregoing **AGREED MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT AND FOR LEAVE TO FILE BRIEFS IN EXCESS OF 15 PAGES IN SUPPORT OF MOTIONS TO DISMISS** with the Clerk of the Court using the CM/ECF system which sent notification of filing to all counsel of record.

/s/ Nancy A. Temple
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